

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A BRAZOS
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.

Defendant.

Civil Action No.: 6:20-cv-00812-ADA
6:20-cv-00813-ADA
6:20-cv-00814-ADA
6:20-cv-00815-ADA
6:20-cv-00816-ADA
6:20-cv-00902-ADA
6:20-cv-00903-ADA

JURY TRIAL DEMANDED

**DEFENDANT JUNIPER NETWORKS, INC.’S MOTION TO EXPEDITE HEARING ON
ITS MOTION TO STAY PROCEEDINGS PENDING RESOLUTION OF ITS MOTION
TO TRANSFER**

Defendant Juniper Networks, Inc. (“Juniper”) respectfully moves for an expedited briefing schedule and hearing on its Motion to Stay Proceedings Pending Resolution of Its Motion to Transfer (the “Motion”). Specifically, Juniper respectfully requests that the Court set a briefing schedule in which Brazos’s opposition to Juniper’s Motion is due on Friday, February 5, 2021; Juniper’s reply is due on Monday, February 8, 2021; and the hearing is set for Tuesday, February 9, 2021 or at the Court’s earliest convenience thereafter.

As set forth in Juniper’s brief in support of its Motion, recent Federal Circuit precedent unequivocally requires a stay of all non-transfer-related deadlines until the Court rules on Juniper’s motion to transfer venue to the Northern District of California. *See In re SK Hynix Inc.*, Case No. 2021-113, Dkt. 10 (Fed. Cir. Feb 1, 2021). And the prejudice to Juniper and the Court from continuing to litigate the merits while its transfer motion remains unresolved is ongoing and immediate, as there are several significant substantive deadlines in the coming weeks, including Juniper’s invalidity contentions on February 16, exchange of claim terms for construction on

February 22, exchange of proposed claim constructions on March 8, and disclosure of extrinsic evidence on March 15.

Juniper thus respectfully requests that this Court order the briefing schedule outlined above so that the parties and the Court can avoid spending time and resources litigating merits issues that precedent requires to be stayed until after the Court rules on Juniper's motion to transfer.

Dated: February 3, 2021

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Counsel for Defendant

Juniper Networks, Inc.

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on February 3, 2021, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

Dated: February 3, 2021

/s/ B. Russell Horton
B. Russell Horton